

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

HUGO PALACIOS VAZQUEZ,

Plaintiff,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 8:24-cv-00480

**JOINT STIPULATION TO EXTEND
RESPONSE DEADLINES**

COME NOW the Plaintiff Hugo Palacios Vazquez ("Plaintiff"), and the Defendant Board of Regents of the University of Nebraska ("Defendant"), by and through their respective counsel of record, pursuant to FED. R. CIV. P. 6(b), FED. R. CIV. P. 7(b), and NECivR7.1(a)(1)(B), and respectfully stipulate to and jointly move the Court for an Order extending Defendant's deadline to file a responsive pleading to Plaintiff's Amended Complaint [*Filing 26*] by a period of thirty (30) days. In support of this Joint Stipulation, the parties hereby state as follows:

1. On March 3, 2025, Plaintiff filed his Amended Complaint in the above-referenced matter. [*Filing 26*].
2. On March 17, 2025, Defendant was served with Summons and the Complaint.
3. Defendant's current deadline to file a responsive pleading to Plaintiff's Amended Complaint is April 7, 2025.
4. Defendant respectfully seeks to extend its response deadline by a period of thirty (30) days, or until May 7, 2025, to enable their counsel to familiarize themselves with the Amended Complaint and to prepare a response thereto.
5. This is Defendant's first request for an extension of time to answer or otherwise respond to Plaintiff's Amended Complaint.

6. Counsel for the Defendant has conferred with Plaintiff's counsel, who has represented Plaintiff does not oppose Defendant's request, provided that in the event Defendant files a Motion to Dismiss in response to Plaintiff's Amended Complaint pursuant to FED. R. CIV. P. 12(b), Plaintiff may have, in addition to its 21-day deadline under NECivR 7.1(b), an additional 30 days to respond to Defendant's Motion to Dismiss.

7. The parties do not believe these requested extensions of time will unduly delay the progression of this case.

8. Pursuant to NECivR 11.1(a)(3)(A), the undersigned counsel for Plaintiff represent their consent to the filing of this Joint Stipulation.

WHEREFORE, Plaintiff Hugo Palacios Vazquez and Defendant Board of Regents of the University of Nebraska respectfully request the Court enter an Order: (A) extending Defendant's deadline to file a responsive pleading to Plaintiff's Amended Complaint [*Filing 26*] by a period of thirty (30) days, from April 7, 2025 to May 7, 2025; and (B) allowing Plaintiff, in the event Defendant files a Motion to Dismiss in response to Plaintiff's Amended Complaint, 51 days to respond to Defendant's Motion to Dismiss.

Dated this 4th day of April, 2025.

Respectfully submitted jointly by:

By: s/ 
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CERTIFICATE OF SERVICE

I, Tara A. Stingley, hereby certify I electronically filed the foregoing document on April 4, 2025, with the Clerk of the United States District Court for the District of Nebraska using the CM/ECF system, which sent an electronic copy to all registered case participants, including the following:

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